

Anchill, Benjamin (USAMIE)

From: Anchill, Benjamin (USAMIE)
Sent: Friday, October 28, 2022 3:59 PM
To: Michelle Benvenuto; Keith Altman
Cc: Lori Crusselle; General Email; Liti; Jill Gelhausen; Brian E. Koncius
Subject: RE: DaSilva - Deposition Notices
Attachments: Motion for Protective Order.docx

Keith,

Defendant anticipates filing a motion for a protective order with regard to Topics 6, 7, and 8 in Plaintiff's Rule 30(b)(6) deposition notice. A draft of the motion that we intend to file is attached. Pursuant to Local Rule 7.1(a), please let me know if Plaintiff will agree to withdraw Topics 6, 7, and 8. I am available to discuss by phone, if that would be helpful. We hope to get the motion on file by COB on Monday, but if you need more time to review, please let me know.

Also, please let us know if you prefer to proceed with the Rule 30(b)(6) deposition as scheduled on November 9, 2022, for Topics 1-5 only, or if you would like to postpone the 30(b)(6) deposition all together until we have a ruling from the Court on Topics 6, 7, and 8. Our thought it that postponing the deposition would be more efficient, but we defer to your preference.

Ben

From: Michelle Benvenuto <michellebenvenuto@kaltmanlaw.com>
Sent: Tuesday, October 25, 2022 11:52 AM
To: Anchill, Benjamin (USAMIE) <BAnchill@usa.doj.gov>; Brian E. Koncius <bkoncius@kbogaslaw.com>
Cc: Keith Altman <keithaltman@kaltmanlaw.com>; Lori Crusselle <loricrusselle@kaltmanlaw.com>; General Email <office@kbogaslaw.com>; Liti <liti@kaltmanlaw.com>; Jill Gelhausen <JillFultz@kaltmanlaw.com>
Subject: [EXTERNAL] RE: DaSilva - Deposition Notices

Counsel,

Per counsels' meet and confer last week, attached please find Plaintiff's revised Rule 30(b)(6) Topics (Exhibit A to the Notice).



Michelle Benvenuto
Litigation Paralegal
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Anchill, Benjamin (USAMIE)

From: Lori Crusselle <loricrusselle@kaltmanlaw.com>
Sent: Monday, October 31, 2022 12:53 PM
To: Anchill, Benjamin (USAMIE)
Cc: bkoncius@kbogaslaw.com; Keith Altman; Michelle Benvenuto
Subject: [EXTERNAL] DaSilva

Importance: High

Dear Mr. Anchill,

I am writing at the request and direction of Mr. Altman.

We will be opposing your Proposed Motion for Protective Order regarding Topics 6, 7, and 8 in Plaintiff's Rule 30(b)(6) Deposition Notice. We will not agree to withdraw Topics 6, 7, and 8.

We intend to proceed with the Rule 30(b)(6) deposition as scheduled on November 9, 2022 for all of the listed topics on the Rule 30(b)(6) Deposition Notice (Topics 1 – 8).

If the court rules against allowing Topics 6, 7, and 8 after the deposition takes place, we will at that time act accordingly to protect that information from entering evidence.



Lori Crusselle
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